

EXHIBIT 6

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, TYLER MAGILL, APRIL
MUNIZ, HANNAH PEARCE, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, and JOHN DOE,

Plaintiffs,

v.

Civil Action No.: 3:17CV00072

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES ALEX
FIELDS, JR., VANGUARD AMERICA,
ANDREW ANGLIN, MOONBASE
HOLDINGS, LLC, ROBERT "AZZMADOR"
RAY, NATHAN DAMIGO, ELLIOTT
KLINE a/k/a ELI MOSELEY, IDENTITY
EVROPA, MATTHEW HEIMBACH, MATTHEW
PARROTT a/k/a DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS, LEAGUE
OF THE SOUTH, JEFF SCHOEP, NATIONAL
SOCIALIST MOVEMENT, NATIONALIST
FRONT, AUGUSTUS SOL INVICTUS,
FRATERNAL ORDER OF THE ALT-KNIGHTS,
MICHAEL "ENOCK" PEINOVICH, LOYAL
WHITE KNIGHTS OF THE KU KLUX KLAN,
and EAST COAST KNIGHTS OF THE KU KLUX
KLAN a/k/a EAST COAST KNIGHTS OF THE
TRUE INVISIBLE EMPIRE,

Defendants.

DEFENDANT FIELDS' ANSWERS TO PLAINTIFFS' THIRD SET OF
INTERROGATORIES TO ALL INDIVIDUAL DEFENDANTS

COMES NOW Defendant JAMES ALEX FIELDS, JR. ("Fields"), by counsel, and for his
Answers to Plaintiffs' Third Set of Interrogatories, states as follows:

1. For each social media or email account you have used or created, identify (a) the social media or email provider (including, but not limited to, Instagram, Facebook, Twitter, YouTube, Discover, and Google gmail), (b) the date the account was created, (c) all usernames, handles, passwords, pseudonyms, Social Media Handles, names, phone numbers, aliases, account identifiers, and email addresses associated with the account, and (d) all persons who have had access to the account and the date(s) during which they had access..

ANSWER: (a) Fields has previously answered this interrogatory in prior discovery. Fields restates that he has not had access to his cell phone or computer since the afternoon of August 12, 2017 and has not logged on to a single social media account in over three years. Thereby, he has no means to attempt to locate additional information. As previously provided in discovery, Fields recalls @TheNewGiantDad was a Twitter account. His Facebook account had a username james.fields.9279 and a display name of “ConsciousOvisAries.” Fields had a Discord account – used only for gaming – but does not recall the user or account name. Fields had a YouTube account but does not recall the username or display name.

(b) Fields does not recall the specific date any account was created and has no manner by which to attempt to obtain this information.

(c) See above. Fields does not recall any additional user or display names for any such account. Fields notes that Plaintiffs’ counsel has received voluminous electronic discovery regarding the Commonwealth of Virginia and FBI investigation results of his social media accounts. While he does not recall the specific communications contained therein, Fields does not dispute the accuracy of the reports and incorporates same into his answer by reference.

(d) Fields is not aware of anyone else having access to any of his social media accounts

before August 12, 2017. Upon information and belief, law enforcement had access to Fields' social media accounts after August 12, 2017.

2. Describe in detail the substance of all communications, whether oral or written, between you and any other person or entity concerning the Unite the Right rally.

ANSWER: .Other than the communications described herein and in his other answers to discovery in this case, Fields recalls receiving correspondence in jail that can predominantly be described as hate mail. Fields did receive a small percentage of supportive letters from various unknown sympathizers or members of organizations that attended or supported the Rally. Fields did not know these people prior to Unite the Right. Fields has also exchanged letters with his mother and his attorneys. Fields recalls receiving two Christmas cards from Vanguard America while incarcerated.

Fields recall discussing the events of August 12 with other Rally attendees who were incarcerated in the weeks after August 12. In regard to the specifics of those conversations while incarcerated, Fields hereby asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

Fields notes that Plaintiffs' counsel has received voluminous electronic discovery regarding the Commonwealth of Virginia and FBI investigation results of his social media accounts. While he does not recall the specific communications contained therein, Fields does not dispute the accuracy of the reports and incorporates same into his answer by reference.

3. Identify ever person or entity with whom you communicated on August 12, 2017, whether orally or in writing and, for each such person or entity, describe in detail the substance of the

communications.

ANSWER: Fields does not recall everyone he communicated with on August 12, 2017. Fields recalls communicating with individuals he believed to be members of Vanguard America. One individual offered him a shield, which Fields accepted. He does not know the identity of that individual or any other member of Vanguard America with whom he may have interacted on August 12, 2017, as he was never a member. Fields recalls a lot of yelling and screaming and noise but no specific conversations while in Lee Park. Fields does recall chanting along with other Rally attendees but does not recall the specific words uttered. Fields recalls various interactions with protesters involving basically yelling back and forth. He does not recall the specific statements made and does not know the identity of any counter protester with whom he interacted. Fields recalls generally discussing potentially getting something to eat with the three individuals walking back from McIntire Park. While he did not know their names at the time, Fields has learned their names are Sarah Bolstad, Hayden Lee Calhoun, and Joshua Matthews. He recalls they declined preferring to leave town and he gave them rides to their respective vehicles. Thereafter, Fields spoke only with members of law enforcement. Regarding communications with law enforcement, Fields hereby asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination

4. Identify every person or entity with whom you communicated between January 1, 2017 and August 13, 2017, whether orally or in writing, concerning individuals or groups who are non-white, Jewish, Muslim, Hispanic, black, or politically liberal and, for each such person or entity, describe in detail the substance of the communications.

ANSWER: Fields does not recall every person or entity he communicated with over a

seven and one half month time period over three years ago. As previously indicated in discovery, Fields recalls posting a direct message to David Duke and Richard Spencer, neither of which was returned. He recalls following Richard Spencer on YouTube and Twitter. Fields recalls following Augustus Sol Invictus and Michael Peinovich on Twitter. Fields also notes that Plaintiffs' counsel has received voluminous electronic discovery regarding the Commonwealth of Virginia and FBI investigation results of his social media accounts. While he does not recall the specific communications contained therein, Fields does not dispute the accuracy of the reports and incorporates same into his answer by reference. Fields generally recalls posting antagonistic and provocative material on Twitter, YouTube and possibly Facebook during this time period that often denigrated people of color and politically liberal individuals.

5. Describe in detail how you learned about the Unite the Right rally.

ANSWER: Fields does not specifically recall when he learned about the Unite the Right Rally. Upon information and belief, Fields saw social media postings about the Rally a month or so prior to the Rally. Most likely, these postings would have been on the social media – likely Twitter – accounts of one or more of the following individuals: Augustus Sol Invictus, Richard Spencer, David Duke, or Michael Peinovich.

6. Describe in detail all reasons you attended the Unite the Right rally, including but not limited to, (a) when you made the decision to attend, (b) why you chose to attend, and (c) your purposes and goals of attending.

ANSWER: (a) Fields hoped to attend the Rally when he first heard about the Rally

approximately one month prior to the rally. He requested time off from work but was unsure whether the request was granted until a day or two before the Rally.

(b) Fields attended the Rally to see the speakers.

(c) Fields hoped to hear the speakers and perhaps have the opportunity to meet some of them.

7. Describe in detail your actions at the Unite the Right rally and during the day of August 12, 2017, including, but not limited to, (a) the approximate time and locations where you were present, (b) your actions at each location, and (c) the identity of each person and/or group you were with.

ANSWER: While this interrogatory seeks a level of detail and recall well beyond human comprehension more than three years later, the following is what Fields can currently recall. Fields traveled from Maumee, Ohio to Charlottesville, Virginia the night of August 11 and early morning of August 12, 2017. Upon his arrival in Charlottesville in the early morning hours of August 12 – perhaps an hour or two before dawn – Fields parked in the McDonalds parking lot on 5th Street and played video games on his cellular phone. After the sun came up, Fields recalls getting something to eat. Sometime thereafter, perhaps between 8 and 9 a.m., he began walking towards Lee Park (currently Market Street Park) when he observed other individuals whom he believed to be Rally attendees arriving. Fields does not know the identity of any of these individuals. Fields approached a group of individuals dressed in similar attire. He generally recalls expressing surprise at the hostility of counter protestors. He does not recall the identity of any person in that group nor the specifics of any conversation.

An unknown member of Vanguard America offered Fields a shield. Fields took the shield and carried it on August 12, 2017, walking with members of Vanguard America to Lee Park for the

Rally. Fields remained in Lee Park in the vicinity of Vanguard America members for some time. After police declared an unlawful assembly, Fields walked with a group of Rally attendees to McIntire Park. Fields does not know the name or identity of any of that group of people but believed some to be members of Vanguard America. After a short time at McIntire Park, Fields walked back to his car behind the McDonald's on 5th Street in Charlottesville with three other individuals who were present at McIntire Park and who Fields believed to be Rally attendees. While he did not know their names at the time, Fields has learned these individuals' names are Sarah Bolstad, Hayden Lee Calhoun, and Joshua Matthews. Fields gave them rides to their vehicles. After dropping off the last person, Fields recalls putting Maumee, Ohio into his GPS and beginning to attempt to proceed home.

Beyond that time, Fields hereby asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

8. Describe in detail all reasons that you, on August 12, 2017, (a) wore a white polo shirt, (b) wore khaki pants, and (c) carried a Vanguard America shield.

ANSWER: Fields wore a white polo shirt and khaki pants because he thought they looked neat. Further, he read social media posts indicating that this was the sort of attire the event organizers desired rally attendees to wear to make a good impression on individuals who might observe the rally. Fields' white polo shirt did not contain the Vanguard America logo, and he has never been a member of that group. Fields carried a Vanguard America shield on August 12, 2017, because a member of Vanguard America offered him the shield. After arriving at the Rally, Fields realized his attendance at the Rally would be more dangerous than he previously anticipated. He accepted the shield to block projectiles being thrown at him and other Rally attendees.

Respectfully submitted,

JAMES ALEX FIELDS, JR.
By Counsel

David L. Hauck, Esquire (VSB# 20565)
David L. Campbell, Esquire (VSB #75960)
DUANE, HAUCK, DAVIS & GRAVATT, P.C.
100 West Franklin Street
Richmond, Virginia 23220
Telephone: 804-644-7400
Facsimile: 804-303-8911
dcampbell@dhdglaw.com
Counsel for Defendant James A. Fields, Jr.

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of September, 2020, I provided copies of the foregoing via email to the following:

Robert T. Cahill, Esquire
Cooley, LLP
11951 Freedom Drive, 14th Floor
Reston, Virginia 20190-5656
Counsel for Plaintiff

Roberta A. Kaplan, Esquire
Julie E. Fink, Esquire
Kaplan & Company, LLP
350 Fifth Avenue, Suite 7110
New York, New York 10118

Karen L. Dunn, Esquire
William A. Isaacson, Esquire
Boies Schiller Flexner LLP
1401 New York Ave, NW
Washington, DC 20005
Philip M. Bowman, Esquire
Boies Schiller Flexner LLP
575 Lexington Avenue
New York, New York 10022

Alan Levine, Esquire
Cooley LLP
1114 Avenue of the Americas, 46th Floor
New York, New York 10036

David E. Mills, Esquire
Cooley LLP
1299 Pennsylvania Avenue, NW
Suite 700
Washington, DC 20004

Brian Jeffrey Jones, Esq.
106 W. South Street, Suite 211
Charlottesville, Virginia 22902
*Attorney for Defendants Michael Hill, Michael Tubbs, and
the League of the South*

Elmer Woodard, Esquire
5661 US Hwy. 29
Blairs, Virginia 24527
*Attorney for Defendants Christopher Cantwell, Nathan
Damigo, Matthew Heimbach, Identity Europa, Jason
Kessler, Elliot Kline, National Socialist Movement,
Nationalist Front, Matthew Parrott, Jeff Schoep,
Traditionalist Worker Party, Vanguard America, and Robert
Ray*

Michael Peinovich, Defendant *pro se*
519 E. 82nd Street, Apt. 2C
New York, NY 10028

And I hereby certify that I will mail the document by U.S. mail to the following non-filing users:

Richard Spencer
1001-A King Street
Alexandria, Virginia 22314

Loyal White Knights of the Ku Klux Klan
c/o Chris and Amanda Baker
PO Box 54
Pelham, NC 27311